

IN THE STATE COURT OF DEKALB COUNTY
STATE OF GEORGIA

JOSHUA MONTGOMERY, individually
and as assignee of the estate of Joseph
Daniel Wayton, Jr.,

Plaintiff,

v.

STATE FARM FIRE AND CASUALTY
COMPANY,

Defendant.

CIVIL ACTION FILE NO.
22A04501

STIPULATION EXTENDING TIME FOR DEFENDANT
STATE FARM FIRE AND CASUALTY COMPANY
TO ANSWER LAWSUIT

COMES NOW Joshua Montgomery, the Plaintiff in the above-styled civil action, and State Farm Fire and Casualty Company (“State Farm”), the Defendant in the above-styled action, and hereby stipulate and agree that Defendant State Farm shall have through and including **Friday January 6, 2023**, to answer, move, counterclaim, object or otherwise respond to Plaintiff’s Complaint. Plaintiff specifically agrees that by stipulating to this extension, Defendant State Farm does not waive any defenses, including but not limited to, any affirmative defenses, which are specifically reserved.

This 8th day of December, 2022.

SLAPPEY & SADD

/s/ Richard Dolder, Jr.

James (Jay) Sadd
Georgia Bar No. 622010
Richard E. Dolder, Jr.
Georgia Bar No. 220237
Attorneys for Plaintiff

352 Sandy Springs Circle
Atlanta, GA 30328
jay@lawyersatlanta.com
rich@lawyersatlanta.com
404-255-6677

SWIFT, CURRIE, McGHEE & HIERS, LLP

/s/ Maren Cave

MAREN R. CAVE

Georgia State Bar No. 278448

JENNIFER L. NICHOLS

Georgia Bar No. 001294

*Attorneys for Defendant State Farm Fire and
Casualty Company*

1420 Peachtree Street, N.E.
Suite 800
Atlanta, GA 30309
404-874-8800 (ph)
404-888-6199 (fax)
maren.cave@swiftcurrie.com
jennifer.nichols@swiftcurrie.com

STATE COURT OF
DEKALB COUNTY, GA.
12/8/2022 11:16 AM
E-FILED
BY: Patricia Harris

CERTIFICATE OF SERVICE

This is to certify that I have this day filed the within and foregoing ***STIPULATION EXTENDING TIME FOR DEFENDANT STATE FARM FIRE AND CASUALTY COMPANY TO ANSWER LAWSUIT*** via the Court's electronic filing system, which will automatically send notification of such filing to the following counsel of record as follows:

James (Jay) Sadd
Richard E. Dolder, Jr.
Slappey & Sadd
352 Sandy Springs Circle
Atlanta, GA 30328
jay@lawyersatlanta.com
rich@lawyersatlanta.com
Attorneys for Plaintiff

Maren R. Cave, Esq.
Jennifer L. Nichols, Esq.
Swift, Currie, McGhee & Hiers, LLP
1420 Peachtree Street, N.E., Suite 800
Atlanta, Georgia 30309
maren.cave@swiftcurrie.com
jennifer.nichols@swiftcurrie.com
Attorneys for Defendant State Farm Fire and Casualty Company

This 8th day of December, 2022.

SWIFT CURRIE MCGHEE & HIERS, LLP

/s/ Maren Cave
MAREN R. CAVE
Georgia State Bar No. 278448
JENNIFER L. NICHOLS
Georgia Bar No. 001294
*Attorneys for Defendant State Farm Fire and
Casualty Company*

1420 Peachtree Street, N.E., Suite 800
Atlanta, GA 30309
404-874-8800 (ph)
404-888-6199 (fax)
maren.cave@swiftcurrie.com
jennifer.nichols@swiftcurrie.com